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May 1, 2024

BY ECF

Honorable Taryn A. Merkl
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Shamoli Kapoor v. Michael Matthew Jewelers of Kings Plaza, LLC, et.al.,
Docket No. 22 CV 5027 (HG)(TAM)

Your Honor:

I represent Plaintiff Shamoli Kapoor in the above-referenced matter. I write jointly with Defense Counsel, Bhavleen Sabharwal, Esq., to respectfully request an adjournment of the settlement conference from May 16, 2024 to a date and time convenient for the Court in June, with a corresponding adjournment of the May 6, 2024 deadline to submit pre-settlement statements. The basis for this request is the parties' need to complete the discovery they believe necessary to have a fruitful settlement conference. Since the April 18, 2024, status conference, counsel have been conferring by both telephone and email regarding various discovery items, and working with their respective clients. Counsel does not believe they can complete this process sufficiently in advance of the date to submit settlement statements, or indeed, the settlement conference itself. Although counsel is hopeful that all disputes can be resolved between the parties, this adjournment would also allow time for counsel to raise any discovery disputes pursuant to the Court's individual rules well in advance of the conference. In addition, I have been in touch with counsel for Ms. Kapoor in the state court actions, and Ms. Sabharwal was making efforts to speak to counsel representing her clients in those matters. Based on the foregoing, the parties respectfully request to adjourn the settlement conference to a date and time convenient for the Court in June, and a

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corresponding adjournment of the deadline to submit pre-settlement conference statements.

The parties thank the Court for its consideration of this application.

Respectfully submitted,

/s/

Joshua J. Lax, Esq.

CC: All Counsel (By ECF)